

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

MARTINA FICHERA,

Plaintiff,

v.

ZOETOP BUSINESS CO., LIMITED., a Hong
Kong Limited Company, SHEIN
DISTRIBUTION CORP., a Delaware
Corporation, and ROADGET BUSINESS
PTE. LTD.,

Defendants.

S.D.FLA. NO. 1:23-CV-20417-JB

AND CONSOLIDATED CASES

Administratively closed, consolidated cases:
23-cv-20434, 23-cv-20444, 23-cv-20471, 24-
cv-20259, 24-cv-20362, 24-cv-20363, 24-
cv20373

STIPULATION OF DISMISSAL

Plaintiffs KENNY OSINNOWO, G&S PRINTS, FRANCIS MINOZA, LAURENCE MINOZA, KEVIN TAN, SUNG KIM ART, LLC, CHALERMPHOL HARNCHAKKHAM, and LINDSAY JANET GOLDMAN; Defendants SHEIN DISTRIBUTION CORP., and ROADGET BUSINESS PTE. LTD, and Former Defendant ZOETOP BUSINESS CO. LIMITED¹, by and through their undersigned counsel, hereby stipulate pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) to the entry of an order dismissing the entirety of this consolidated action, including the lead consolidated case, which is:

Martina Fichera v Zoetop Business Co. Limited, et al., Case No. 1:23-cv-20417)²;

¹ Former defendant Zoetop was previously dismissed from the consolidated action without prejudice by stipulation on March 28, 2024 (ECF No. 124).

² Former plaintiff Fichera's individual claims were previously dismissed with prejudice by an order of dismissal dated November 6, 2023 (ECF No. 55).

and all of the consolidated cases, which are:

Kenny Osinnowo v. Zoetop Business Co., Limited et. al., Case No. 1:23-cv-20444;
G&S Prints Pte. Ltd. v. Zoetop Business Co. Limited et. al., Case No. 1:23-cv-20471;
Francis Minoza and Laurence Minoza v. Zoetop Business Co. Limited et. al., Case No. 1:23-cv-20434; *Kevin Tan v. Zoetop Business Co. Limited et. al.*, Case No. 1:24-cv-20259; *Chalermphol Harnchakham v. Roadget Business Pte. Ltd. et. al.*, Case No. 1:24-cv-20373; *Sung Kim Art, LLC v. Zoetop Business Co. Limited et. al.*, Case No. 1:24-cv-20362; *Lindsay Janet Goldman v. Zoetop Business Co. Limited et. al.*, Case No. 1:24-cv-20363³;

with prejudice as to all parties, including as to each of the Plaintiffs, Defendants, and Former Defendant, with each party to bear its own costs, attorneys' fees and expenses. For clarity, all aspects of this consolidated action are now intended to be dismissed with prejudice.

Notwithstanding the reference to Fed. R. Civ. P. 41(a)(1)(A)(ii), this stipulation is conditioned upon the Court's entry of an order of dismissal pursuant to Fed. R. Civ. P. 41(a)(2) on terms the Court considers proper, provided that those terms are consistent with the terms set forth in this Stipulation.

Dated: September 3, 2024

Respectfully submitted,

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³ Former plaintiff Golebiowski's case (S.D. Fla. Case No. 23-cv-20433) was previously dismissed with prejudice by an order of dismissal dated April 12, 2023 (ECF No. 29).

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